

**Amendments to the Drawings:**

The attached replacement sheet of drawings includes changes to FIG. 4. This sheet, which includes FIG. 4, replaces the original sheet including FIG. 4. In Figure 4, previously omitted reference numbers 406, 408, 410, 412, and 414 have been added to identify the data section, category nodes, property node, indexing section, and property node, respectively.

Attachment: Replacement Sheet.

## REMARKS

Applicants have thoroughly considered the November 8, 2006 Office action and respectfully request reconsideration of the application as amended. By this Amendment A, claims 1, 8, and 14 have been amended and claims 4, 11, and 15 have been canceled to more clearly set forth the invention. Claims 1-3, 5-10, 12-14, and 16 are presented in the application for further examination. **Applicants also note that the subject matter of canceled claims 4, 11, and 15 has been considered by the Examiner. As such, Applicants submit that this Amendment A raises no new issues that would require further consideration and/or search and raises no issue of new matter. Rather, this Amendment A places the application in better form by materially reducing or simplifying the issues for Examination.** Applicants respectfully request that favorable reconsideration of the application in light of the amendments and following remarks and the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

Applicants submit that the amendments to the drawings as evidenced in the attached replacement sheet properly identify the missing references 406, 408, 410, 412, and 414. No new matter has been added. As such, Applicants request the acceptance of the drawings in the next Office action.

## Claim Rejections

Claims 1-5, 8-11, 14 and 15 stand rejected under 35 U.S.C. §102(e) as being anticipated by Chasen et al. (US Patent No. 6,760,721). Applicants submit that Chasen fails to disclose or suggest each and every element of the rejected claims.

Amended claim 1 recites, in part, “parsing the first property data included in the first metadata field; **identifying a property delimiter included in the first property data in the first metadata field; identifying a first property and a second property based on the identified property delimiter from the parsed first property data, wherein the property delimiter separates the identified first property from the identified second property...**”

Embodiments of the invention enhance the user experience by parsing multi-valued properties within one metadata field. Existing technologies, and as evidenced by Chasen, display a single property node that corresponds to the entire contents of a particular metadata field. For

example, if a media library includes a song by the artist “Frank Sinatra” and a duet by the artists “Frank Sinatra and Aretha Franklin,” embodiments of the invention are able to display the solo performance by “Frank Sinatra” and the duet separately as a result of parsing the first property data in the first metadata field and **identify a first property and a second property** from the parsed first property data.

To the contrary, Chasen fails to disclose or suggest the features of parsing the first property data... and identifying a property delimiter. In particular, nowhere does Chasen disclose or suggest at least the features of parsing the first property data in the first metadata and **identifying a first property and a second property** from the parsed first property data. For example, col. 14, lines 39 to 59, Chasen discloses that

“In state 320, the build process 212 creates a grouping name node as the top of the tree and moves the current location to the top of the tree. Proceeding to a state 325, beginning with the first category in the grouping, and continuing until all of the categories in the grouping have been traversed (states 325 and 345), the build process 212 proceeds to a state 330. In state 330, the build process 212 determines if the category value is already a child node in the tree. If the category value for the current record is not already a child node in the current location of the tree, **the build process 212 proceeds to a state 335 and adds the category value as a child node in the current location of the tree and proceeds to a state 340**. If the category is already a child node in the current location of the tree, the build process 212 proceeds to state 340. In state 340, the build process 212 moves the current location to the node that represents the category value and proceeds to a state 345. In state 345, the build process 212 returns to state 325 if there are any more categories in the grouping. Once all of the categories in the grouping have been traversed (states 325 and 345), the build process 212 proceeds to a state 350 (emphasis added)” (See also Chasen, FIGS. 3 to 5).

Nowhere does Chasen disclose or suggest that the category value is parsed. The Office on page 6 of the Office action argues that “parsing corresponds to “GUI 220 allowing a user to expand a subtree of the master tree 122 in order to view subtree children.” However, allowing a user to expand a subtree does not suggest parsing as recited in amended claim 1. Furthermore, embodiments of the invention identify a property delimiter included in the first property data and identify a first property and a second property based on the identified property delimiter from the parsed first property data, wherein the property delimiter separates the identified first property from the identified second property.

Applicants also disagree with the Office’s reading of Chasen in which the Office argues

that the process of identifying the property delimiter is disclosed in Chasen by means of “marking a node with a DIRTY or CLEAN status”. Office action, page 6. Applicants submit that the DIRTY or CLEAN status as disclosed and suggested by Chasen merely indicates whether a node has been changed: “If anything in the node has been changed, the data change process proceeds to a state 650 wherein a Node State is set to DIRTY, and proceeds to a state 670.” (Chasen, lines 13 to 16, col. 16). The DIRTY or CLEAN status indicator does not separate the first property from the second property because Chasen does not disclose or suggest there is more than one property in one node. Therefore, Chasen cannot anticipate claim 1 as amended.

Applicants submit that amended claim 1 is patentable over the cited art. Claims 2, 3 and 5 depend from the independent claim 1 and add additional features to claim 1. Therefore, claims 2, 3 and 5 are also patentable. Hence, Applicants respectfully request the withdrawal of the rejection of claims 1-5 under 35 U.S.C. §102(e).

Similarly, claim 8 is amended to recite, “parsing instructions for parsing the first property data included in the first metadata field; **identifying instructions for identifying a property delimiter included in the first property data in the first metadata field; identifying instructions for identifying a first property and a second property based on the identified property delimiter from the parsed first property data, wherein the property delimiter separates the identified first property from the identified second property...**” For at least the reasons above, Applicants submit that Chasen fails to disclose or at least the features of parsing instructions, identifying instructions for identifying a property delimiter, and identifying instructions for identifying a first property and a second property based on the property delimiter from the parsed property data. Therefore, Chasen cannot anticipate embodiments of the invention as recited in claim 8, and claim 8 is patentable over the cited art. Claims 9 and 10 depend from claim 1, and are also patentable over the cited art for at least the reasons above. Therefore, the rejection of claims 8 to 10 under 35 U.S.C. §102(e) should be withdrawn.

Also, amended claim 14 recites a method comprising, at least, “parsing the first property data included in the first metadata field; **identifying a property delimiter included in the first property data in the first metadata field; identifying a first property and a second property based on the identified property delimiter from the parsed first property data**, wherein the

property delimiter separates the identified first property from the identified second property...” Chasen specifically teaches away from embodiments of the invention by employing the tree structures illustrated from columns 11 to 14 showing single value nodes. Nowhere does Chasen disclose or suggest at least the feature of identifying a property delimiter. The discussion on DIRTY or CLEAN status is merely a status indicator indicating whether a node has been changed. Such status indicator is not comparable to a property delimiter separate one property from another. Therefore, Chasen cannot anticipate claim 14, and claim 14 as amended is patentable over the cited art. Hence, the rejection of claim 14 under 35 U.S.C. §102(e) should be withdrawn.

Claims 6, 7, 12, 13, and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Chasen in view of Dwek et al. (US Patent No. 6,248,946). Claims 6 and 7 depend the independent claim 1, claims 12 and 13 depend from the independent claim 8, and claim 16 depends from the independent claim 14. Applicants submit that Dwek fails to cure the deficiencies of Chasen, and that the combined references fail to disclose or suggest each and every element of the rejected claims for at least the reasons above. In particular, although Dwek relates to subgenres, Dwek fails to disclose at least the features of **parsing the first property data included in the first metadata field, identifying a property delimiter included in the first property data in the first metadata field; identifying a first property and a second property based on the identified property delimiter from the parsed first property data, wherein the property delimiter separates the identified first property from the identified second property.** Hence, the combined references of Chasen and Dwek do not disclose or suggest each and every element of claims 6, 7, 12, 13, and 16. Because the Office fails to establish the *prima facie* elements of an obviousness rejection, Applicants submit that the rejection of claims 6, 7, 12, 13, and 16 under 35 U.S.C. §103(a) should be withdrawn.

Applicants have reviewed the prior art, Matsuoka et al. (US Patent No. 7,113,454), made of record and not relied upon by the Office in the Office and have determined that none of these references anticipate or make obvious the recited invention in light of the foregoing amendment. The fact that Applicants may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicants’ agreement therewith.

In view of the foregoing, applicants submit that amended claims 1-3, 5-10, 12-14, and 16 are clearly distinguishable and are allowable over the cited art. It is felt that the above amendments do not introduce new elements or features of the coverage of the invention as claimed. It is felt that a full and complete response has been made to the Office action and, as such, places the application in condition for allowance. Such allowance is hereby respectfully requested.

**The Applicants wish to expedite prosecution of this application. If the Examiner deems the claims as amended to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.**

Applicants do not believe a fee is due. If, however, the Commissioner determines otherwise, other deficient fees may be charged during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,

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